

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

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CROSS RIVER BANK,

Plaintiff,

v.

3 BEA'S ASSISTED LIVING LLC, a  
Maryland Limited Liability Company, a/k/a  
THREE BEA'S ASSISTED LIVING  
CONNIE STEWART, and  
DAVID STEWART

Defendants.

Case No. 8:21-cv-03210-TJS

**PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

Plaintiff, Cross River Bank, by counsel, and pursuant to Federal Rule of Civil Procedure 56 and Local Rule 105, hereby moves for summary judgment on all counts of its Amended Complaint. Plaintiff requests that judgment in the amount of \$1,829,358.20, plus interest and late fees accruing after the motion filing, plus reasonable attorneys' fees and costs to be proven at a later date, in accordance with the Federal Rules of Civil Procedure and the Court's Local Rules, be entered, pursuant to liability under each of the Causes of Action stated in the Amended Complaint, against Defendants 3 Bea's Assisted Living, LLC and Connie Stewart. Additionally, Plaintiff seeks an order of the Court, pursuant to the Maryland Uniform Fraudulent Conveyance Act, vesting title in 3 Bea's Assisted Living, LLC of the real property located in Prince George's County, Maryland having an address of 13500 Danielle Circle, Brandywine, Maryland 20613 and described as "Lot 9, Plat of Correction Plat One Lots 1, 2, 9, 10 & 11 Erik's Ridge" as per Plat thereof recorded in Plat Book REP 215 at Plat 33 among the land records of Prince George's

County, Maryland. In support hereof, Plaintiff refers to the attached memorandum and the exhibits attached thereto.

Dated: November 11, 2022

Respectfully submitted,

/s/ Blake W. Frieman  
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/s/ Jonathan J. Lerner  
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***ATTORNEYS FOR CROSS RIVER BANK***

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 11, 2022, I electronically filed the foregoing using the CM/ECF system, thus causing an electronic copy to be served upon all registered users in this case.

/s/ Jonathan J. Lerner  
Jonathan J. Lerner